

(A)

**In The United States District Court
For The Northern District Of Illinois
Eastern Division**

**Commodity Futures Trading
Commission,**

Plaintiff,

v.

**One World Capital Group, LLC
and John Edward Walsh,**

Defendants.

Civil Action No. 07 CV 7002

Judge Joan H. Lefkow

Magistrate Judge Keys

**STIPULATION AMENDING THE DECEMBER 13, 2007 EX PARTE STATUTORY
RESTRAINING ORDER TO PERMIT LIMITED ACCESS TO FUNDS FOR PAYMENT
OF BUSINESS EXPENSES**

Plaintiff, Commodity Futures Trading Commission ("CFTC"), and Defendants One World Capital Group, LLC, and John Edward Walsh, submit this Stipulation to Amend the *Ex Parte* Statutory Restraining Order to permit limited access to certain funds subject to the asset freeze. All parties have agreed, through their undersigned counsel, to the entry of this Stipulation.

In support of its stipulation, the CFTC states the following:

1. On December 13, 2007, Plaintiff Commodity Futures Trading Commission ("Commission") filed a Complaint against Defendants, One World Capital Group, LLC ("One World") a futures commission merchant ("FCM") registered with the Commission that also acted as a forex dealer member ("FDM") of the National Futures Association ("NFA"), and One World's President, John Edward Walsh, seeking injunctive and other equitable relief for violations of the Commodity Exchange Act, as amended ("Act"), 7 U.S.C. §§ 1 *et seq.* (2002) and the Commission Regulations promulgated thereunder, 17 C.F.R. §§ 1 *et seq.* (2007). Also on December 13, 2007, the Court entered an *Ex Parte* Statutory Restraining Order against the defendants. Pursuant to the *Ex Parte* Statutory Restraining Order, beginning on page 2, the

assets of One World are subject to an asset freeze. On December 18, 2007, the parties entered an Agreed Order Extending the *Ex Parte* Statutory Restraining Order until February 7, 2008.

2. Defendants have requested a release of a limited amount of funds in order to maintain One World's office space for the month of January 2008.

A. Business Expenses

3. Defendants have represented to the CFTC that rental expenses to maintain the One World office space at 818 Elm Street in Winnetka, Illinois 60093 for the month of January 2008 are \$2,025. Additionally, Defendants have represented that the cost to maintain utilities in that same space for the month of January 2008 should not exceed \$700.

4. One World maintains an operating account at Harris Bank with the account number ending in 2887 that is titled "One World Capital Group, Operating Account" ("One World Harris Operating Account"). \$2,725 in the One World Harris Operating Account shall be released from the asset freeze.

5. Defendants Walsh and One World, under review by the CFTC and the Court, are hereby directed to execute payment of \$2,025 to Forte Real Estate, 300 Custer Avenue, Evanston, Illinois for rent for the month of January 2008 for 818 Elm Street Winnetka, Illinois.

6. Defendants Walsh and One World, under review by the CFTC and the Court, are hereby directed to execute payments not to exceed in the aggregate \$700 to The Village of Winnetka (water and electric), Comcast (internet access), AT&T (telephone) and North Shore Gas (gas) for utilities for the month of January 2008 for 818 Elm Street Winnetka, Illinois.

7. Defendants Walsh and One World shall be obligated to provide evidence of the payments allowed under paragraphs 5 and 6 to the CFTC within 24 hours of each such payment and to account for any balance remaining after payment of all allowed expenses.

8. No other assets shall be released or removed from the One World Harris Operating Account without express permission of the Court.

9. This stipulation shall remain in effect until further order of the Court.

It is hereby stipulated by and between the undersigned that Defendants shall be permitted access to \$2,725 for the month of January 2008 for the sole purpose of maintaining the office

space at 818 Elm Street, Winnetka, Illinois, subject to the above, and that \$2,725 in the One World Harris Operating Account ending in 2887 shall be released from the asset freeze of the *Ex Parte* Statutory Restraining Order as described above. No other funds shall be released.

Dated: December 21, 2007

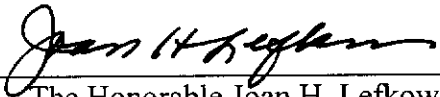
CONSENTED TO AND APPROVED BY:

/s/ Kevin M. Flynn
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IT IS SO ORDERED.

Date: January 7, 2008


The Honorable Joan H. Lefkow
UNITED STATES DISTRICT JUDGE
Northern District of Illinois

Certificate of Service

The undersigned, an attorney with the Commodity Futures Trading Commission, certify that I caused to be served a copy of the **STIPULATION AMENDING THE DECEMBER 13, 2007 EX PARTE STATUTORY RESTRAINING ORDER TO PERMIT LIMITED ACCESS TO FUNDS FOR PAYMENT OF BUSINESS EXPENSES** via regular U.S. Mail, to the following listed party on December 21, 2007:

/s/Jennifer S. Diamond
Jennifer S. Diamond

SERVICE LIST

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